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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,) NO. CR 07-0337 MHP
14 Plaintiff,)
15 v.)
16 JACQUELINE FROEHLICH-L'HEUREAUX,)
17 Defendant.)
18 _____

19) STIPULATION AND [PROPOSED] ORDER
20) UNSEALING THE APPLICATION FOR
21) PERMISSION TO ENTER PLEA OF GUILTY

22 The United States of America, by and through its attorney Assistant United States
23 Attorney Kyle F. Waldinger, and the defendant Jacqueline Froehlich-L'Heureaux, by and through
24 her attorney Leland B. Altschuler, hereby stipulate and agree that the Application for Permission
25 to Enter Plea of Guilty in this matter may be unsealed. In further support of this request, the
26 parties state as follows:

27 1. The defendant entered her plea of guilty in open Court on June 4, 2007. At that
28 time, the Court ordered that the plea-related materials be filed under seal.

29 2. Since that time, the United States has obtained an Indictment charging the
30 defendants David Nosal and Becky Christian with numerous offenses. That case is numbered
31 CR 08-0237 MHP. Christian's case is set for trial on August 5, 2008.

32 3. The government intends to produce the defendant Jacqueline Froehlich-

33 STIPULATION AND [PROPOSED] ORDER
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L'Heureaux's Application for Permission to Enter Plea of Guilty to the defendants Nosal and Christian because it contains statements of the defendant. Before doing so, the United States seeks to unseal that application. (The Court previously unsealed the plea agreement.)

4. Accordingly, for the reasons stated above, the parties stipulate and agree that the defendant Jacqueline Froehlich-L'Heureaux's Application for Permission to Enter Plea of Guilty should be unsealed. For purposes of clarity, the parties jointly request that the Court unseal the docket entries numbered 5 through 7, which all pertain to the defendant's entry of plea.

SO STIPULATED.

DATED: July 8, 2008

BRIAN J. STRETCH
Acting United States Attorney

KYLE F. WALDINGER
Assistant United States Attorney

DATED: July 8, 2008

/s/
LELAND B. ALTSCHULER
Attorney for defendant Jacqueline Froehlich-
L'Heureaux

~~PROPOSED~~ ORDER

Good cause appearing therefor, it is hereby ordered that the Application for Permission to Enter Plea of Guilty filed in this matter on or about June 4, 2007 is UNSEALED. The Court further orders that the docket entries 5 through 7 be UNSEALED.

DATED: July 9, 2008

MARILYN HALE FATEL
UNITED STATES DISTRICT JUDGE

IT IS SO ORDERED



Judge Marilyn H. Patel

STIPULATION AND [PROPOSED] ORDER
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